

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

Plaintiff,

vs.

HAMLET TANTUSHYAN,

Defendant.

} Case No.: 19-368, 1  
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**DEFENDANT HAMLET TANTUSHYAN'S RESPONSE TO THE  
GOVERNMENT'S MOTION FOR JUDICIAL INQUIRY**

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Defendant, Hamlet Tantushyan, by and through his attorney of record, George G. Mgdesyan, hereby responds to the government's motion for a judicial Inquiry, pursuant to Rule 44(c) of the Federal Rules of Criminal Procedure.

1. Defendant, Hamlet Tantushyan, Hrachya Gyulumyan and six other individuals were charged with conspiracy, bank fraud, aggravated identity theft and money laundering on May 22, 2019.

2. In June 2019, counsel for Mr. Tantushyan contacted government counsel and notified her that he would be representing Mr. Tantushyan in this matter.

3. Defendant's counsel currently shares office space with that of Mr. Gyulumyan's counsel, Sarkis Manukyan. In addition, both counsels utilize the same legal assistant.

4. Even though both attorneys share a legal assistant, all case files and information are kept separate. No specific case information is discussed with the legal assistant that may create a conflict between the two defendants. Secondly, each defendant's case is kept separate with the attorney that is handling the matter. No such conflict exists nor does defendant's counsel believe such a conflict will arise in the future.

5. In the case that the Court may determine a conflict exists or may arise, Mr. Tantushyan is willing to make a voluntary, knowing and intelligent waiver of such a conflict. As such, counsel is requesting he not be terminated/disqualified from representing Mr. Tantushyan.

Dated: October 22, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Mgdesyany', is written over a horizontal line.

GEORGE G. MGDESYAN, ESQ.  
Attorney for Defendant,  
**Hamlet Tantushyan**